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NAS PENSACOLA
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EXTENSION OF SITE MANAGEMENT PLAN DEADLINES SITE 43 OPERABLE UNIT 18
(OU18) 2012 NAS PENSACOLA FL
4/12/2012
NAVFAC SOUTHEAST



DEPARTMENT OF THE NAVY
Naval Facilities Engineering Command Southeast
Jacksonville, FL 32212-0030

Memorandum for the file

Date: April 12, 2012

Subject: Extension of Calendar Year 2012 NAS Pensacola Site Management Plan (SMP)
Deadlines, Extension Number 2012-011.

From: Patty Marajh-Whittemore, Navy
David Grabka, FDEP
Tim Woolheater, USEPA Region 4

To: File

In accordance with Part XXIII of the October 23, 1990, Federal Facilities Agreement, deadlines established in the SMP may be extended pursuant to part XXIV. Below is a request for extending a deadline date in accordance with Part XXIV, paragraph A.1-4 as agreed to by the parties and is extended in accordance with paragraph E. The change recorded in this memo will be reflected in the calendar year 2012 Final SMP update submitted December 1, 2011.

1. **OU/SITE Number & Description :** Operable Unit (OU) 18, Site 43 Demolition Debris Disposal Area
2. **Deadline or schedule being extended:** Submittal of the Draft Remedial Action Work Plan for OU 18, Site 43 Naval Air Station (NAS) Pensacola, Pensacola, Florida.
3. **Length of extension/new deadline:** 78-day extension for preparing the Draft Remedial Action Work Plan from April 13, 2012 to June 30, 2012. The schedule extension also affects document delivery dates for the Remedial Action Completion Report. Therefore, a 153-day extension for submittal of the Draft Remedial Action Completion Report from April 30, 2012 to September 30, 2012 is also required.
4. **Good Cause**
 - ☐ Force Majeure
 - ☐ Another Parties Failure
 - ☐ Dispute Resolution
 - ☒ Delay caused by extension granted for other deadline
 - ☒ Events or series of events mutually agreed to by the Parties

5. Brief description/Explanation of cause:

During December 13 and 14, 2011, the Naval Air Station Pensacola (NASP) Partnering Team (the Team) held a quarterly Team meeting. During discussions at this meeting, the US Environmental Protection Agency (EPA) required additional analytical tests for soil leachability instead of the Synthetic Precipitation Leaching Procedure (SPLP) using EPA method 1312. Various discussions ensued however it was unclear as to what alternate analytical method should be completed. The Navy initiated a conference call on February 8, 2012 between the Navy, EPA and the Florida Department of Environmental Protection (FDEP) to discuss the use of SPLP and additional leaching procedures and as a result of the conference call, EPA provided a memo with suggested guidance for the evaluation of the potential for soil contaminants to leach to groundwater.

A revised sampling approach incorporating the SPLP analysis along with total lead analysis using EPA Method 6010 was proposed by the Navy during the March 13-14, 2012 quarterly NASP Team Partnering Meeting. Per the Final Remedial Design for Site 43 and the data quality objectives (DQO) discussions held during the September 2011 quarterly Team meeting, X-ray Fluorescence (XRF) field screening is being used at this site to guide the limits of excavation for lead contamination in surface and subsurface soils. At this meeting, EPA indicated a preference for the Navy to conduct XRF field screening to a goal of 800 mg/kg of lead instead of the previously proposed screening goal based on the 1,400 mg/kg value (which is the FDEP Direct Exposure Industrial Soil Cleanup Target Level (SCTL)). The Team was not able to reach a consensus on a revision to the XRF field screening goal for lead in soils at this site during this Team meeting.

In order to facilitate further discussion to reach Team consensus on the screening goal and continue preparation of the Unified Federal Procedure Sampling and Analysis Plan (UFP-SAP) and the Remedial Action Work Plan, the Navy requests a milestone schedule extension of 90 days with a proposed revised submittal date for the Draft Remedial Action Work Plan and the UFP-SAP from April 13, 2012 to June 30, 2012. A revised Milestone Schedule that reflects the 78- day schedule extension is attached.

The 78- day extension for the Draft Remedial Action Work Plan will allow:

- A further discussion and achievement of consensus on the XRF screening goal and the soil leaching procedures proposed by EPA
- Incorporation of the revised soil leaching procedure into the UFP SAP and Remedial Action Work Plan

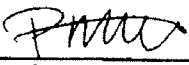
The 153- day extension for the Draft Remedial Action Completion Report will allow:

- Mobilization, pre-excavation sampling, contaminated soil excavation and backfilling.
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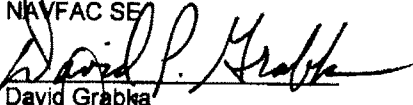
installation and development of new monitoring wells and site restoration of the contaminated soil hotspots at Site 43

- Preparation, submittal and Navy review of Draft Remedial Action Completion Report

IT IS SO AGREED


Patty Marajh – Whittemore
Remedial Project Manager
NAVFAC SE

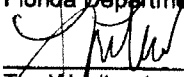
4/12/2012
Date


David Grabka
Remedial Project Manager
Florida Department of Environmental Protection

4/16/12
Date

☐ Timely

☒ Good Cause


Tim Woolheater
Remedial Project Manager
USEPA, Region 4

4/25/12
Date

☐ Timely

☒ Good Cause



DEPARTMENT OF THE NAVY
Naval Facilities Engineering Command Southeast
Jacksonville, FL 32212-0030

Memorandum for the file

Date: April 11, 2012

Subject: Extension of Calendar Year 2012 NAS Pensacola Site Management Plan (SMP)
Deadlines, Extension Number 2012-010.

From: Patty Marajh-Whittemore, Navy
David Grabka, FDEP
Tim Woolheater, USEPA Region 4

To: File

In accordance with Part XXIII of the October 23, 1990, Federal Facilities Agreement, deadlines established in the SMP may be extended pursuant to part XXIV. Below is a request for extending a deadline date in accordance with Part XXIV, paragraph A.1-4 as agreed to by the parties and is extended in accordance with paragraph E. The change recorded in this memo will be reflected in the calendar year 2012 Final SMP update submitted December 1, 2011.

1. **OU/SITE Number & Description :** Operable Unit (OU) 2 Sites 11, 12, 25, 26, 27 and 30.
2. **Deadline or schedule being extended:** Submittal of the Draft Remedial Action Completion Report for OU 2, Sites 11, 12, 25, 26, 27 and 30, Naval Air Station (NAS) Pensacola, Pensacola, Florida.
3. **Length of extension/new deadline:** 546-day extension for submitting the Draft Remedial Action Completion Report from April 10, 2012 to September 28, 2013.
4. **Good Cause**
 - € Force Majeure
 - € Another Parties Failure
 - € Dispute Resolution
 - ☒ Delay caused by extension granted for other deadline
 - ☒ Events or series of events mutually agreed to by the Parties
5. **Brief description/Explanation of cause:**

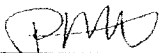
On February 27, 2012, the Navy submitted a request for extension for submittal of the Draft ROD Amendment for OU2 to incorporate a change in the remedy at Site 11 to address

asbestos-containing materials (ACM). Additionally, Radium-226 contamination in soil is being remediated by the Navy but has not been included as a contaminant of concern in the existing Record of Decision (ROD) for OU2. The February 27, 2012 extension request letter also addresses the time required to prepare a Proposed Plan to include ACM and Radium-226 (Ra-226) as contaminants of concern at OU2 followed by a public comment period prior to their inclusion in the ROD Amendment for OU2. This letter requested an extension for submittal of the Draft ROD Amendment from February 29, 2012 to September 30, 2012. In order to provide sufficient time for the preparation, submittal, Navy and regulatory review and approval of a Remedial Action Work Plan (after approval of the Final ROD Amendment), implementation of the remedial action fieldwork and preparation of a Remedial Action Completion Report, an extension to the Draft Remedial Action Completion Report for soils and groundwater for OU2 is required. Completion of fieldwork associated with long-term monitoring of groundwater at OU2 is expected to be accomplished within this extended timeframe. This milestone extension will also affect the deadlines for submittal of future documents. A revised milestone schedule that reflects the milestone extension is included.

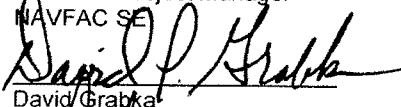
The 546-day extension will allow:

- Preparation, submittal, Navy and regulatory review and approval of a Remedial Action Work Plan for Site 11, OU2
- Implementation of fieldwork per the approved Remedial Action Work Plan for Site 11, OU2
- Preparation, submittal, Navy and regulatory review of the Draft Remedial Action Completion Report for Soils and Groundwater for OU2

IT IS SO AGREED


Patty Marajh – Whittemore
Remedial Project Manager
NAVFAC SE

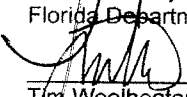
4/11/2012
Date


David Grabka
Remedial Project Manager
Florida Department of Environmental Protection

4/16/12
Date

€ Timely

✓ Good Cause


Tim Woolheater
Remedial Project Manager
USEPA, Region 4

4/25/2012
Date

€ Timely

✓ Good Cause